

6. I regularly worked six or seven days per week, including nights and weekends, for an average of 55 hours per week. And although I was paid a salary, I was not paid an overtime premium of at least one-and-one-half times my regular rate of pay for hours worked in a workweek over 40.

7. Defendants never paid me my last paycheck, covering two weeks of work. Based on previous paychecks I received, that check should have been approximately \$2,788.46.

8. I have calculated based on the best information available to me that I worked at least 315 overtime hours during my employment for Defendants without being paid an overtime premium. This is based on approximately 15 overtime hours worked each week and approximately 21 weeks of employment.

9. Dividing my \$1,394.23 weekly salary by 50 hours results in a regular rate of \$27.88 per hour. The overtime rate is \$41.82 per hour and the halftime rate is \$13.94 per hour. Multiplying the halftime rate by 10 (to account for hours between 40 and 50) and the overtime rate by 5 (to account for hours between 50 and 55) results in an average weekly back pay amount of \$348.50. I was employed by Defendants for approximately 21 weeks, so multiplying \$348.50 by 21 weeks equals \$7,318.50 in unpaid overtime wages.

10. When all of the damages that I am owed in this lawsuit (including final paycheck plus overtime pay and an equal amount of liquidated damages) are added together, the total amount that I am owed is \$17,425.46 excluding attorney fees, costs, and interest.

I declare under penalty of perjury under the law of the United States of America that the foregoing is true and correct. Executed on Apr 25, 2023.

Claudia Torralba
Claudia Torralba (Apr 25, 2023 19:03 CDT)
Claudia Torralba